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IRIS Y. MARTINEZ
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

2024L002614

COMPLAINT AT LAW

Now comes the Plaintiff, Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, complaining of Defendants, Danielle Hollenbeck-Pringle, MD, Erica Hinz, MD, Leah Butler, MD, and Stephen Locher, MD and Respondents in Discovery Diane Lyman, PA-C, Roseland Community Hospital Association, Ann & Robert H. Lurie Children's Hospital of Chicago, and Northwestern Memorial Hospital and in support therefor, states as follows:

Count I: Wrongful Death Against Dr. Hollenbeck-Pringle

1. On March 27, 2023, Patrice Brown (hereinafter, "Patrice") gave birth to her son, Tayon Terry Lamar Brown (hereinafter "Tayon").
2. Tayon died on May 24, 2023.

3. At all times relevant to this Complaint, the Defendant, Danielle Hollenbeck-Pringle, MD (hereinafter “Dr. Hollenbeck-Pringle”) was a physician licensed to practice and practicing medicine in the State of Illinois.

4. At all times relevant to this Complaint, Dr. Hollenbeck-Pringle had a duty to her patient, Patrice, and her unborn son, Tayon, to comply with the standard of care for a reasonably careful physician in the field of obstetrics and gynecology.

5. At all times relevant to this Complaint, Dr. Hollenbeck-Pringle had a duty to act as a reasonably careful physician to exercise due care and caution in the examination, diagnosis, treatment and management of Patrice’s pregnancy.

6. On or about March 24, 2023, Patrice presented to the University of Illinois Hospital with a three-day history of nausea, vomiting and contractions.

7. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle provided gynecological, obstetrical, and other medical services to Patrice at the University of Illinois Hospital.

8. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle charted Patrice required supervision of high-risk pregnancy.

9. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle charted Patrice was having uterine contractions.

10. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle charted Patrice was 1 centimeter dilated.

11. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle charted Patrice’s tocodynamometer as indicating fetal “irritability.”

12. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle performed a speculum exam and charted Patrice had significant vaginal redundancy and that the cervix was not visualized.

13. On or about March 24, 2023 and/or March 25, 2023, Dr. Hollenbeck-Pringle performed a speculum exam and charted that Patrice had a “white thick discharge.”

14. On or about March 25, 2023, Dr. Hollenbeck-Pringle discharged Patrice home with orders to follow-up with her primary obstetrician in one week.

15. On or about March 27, 2023, Patrice called for an Uber ride to return to the University of Illinois Hospital due to increased contractions and abdominal pain. While attempting to enter the vehicle, Patrice gave birth to Tayon in front of her house.

16. On or about March 24, 2023 and/or March 24, 2023 and/or all relevant times herein, Dr. Hollenbeck-Pringle deviated from the standard of care required of her and was negligent in one or more of the following acts and/or omissions:

- (a) failed to properly examine, diagnose, monitor and treat Patrice;
- (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
- (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
- (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
- (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;
- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;

- (h) failed to conduct and appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;
- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;
- (l) failed to supervise and monitor the care provided by nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriate document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hollenbeck-Pringle, Tayon suffered injuries of a personal, physical and pecuniary nature resulting in his death on or about May 24, 2023.

18. As a direct and proximate result of the foregoing negligent acts and/or omissions, the survivors of Tayon sustained substantial pecuniary loss, including but not limited to the loss of Tayon's love; society; companionship; money, benefits, goods and/or services he was likely to contribute in the future; the instruction, moral training, and/or superintendence of education he might reasonably have been expected to give his family in the future; and grief, sorrow and mental suffering damages.

19. At all times relevant, Patrice was the mother of Tayon.

20. Patrice Brown has been appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased.

21. This cause of action is being brought pursuant to the Illinois Wrongful Death Act, 740 ILCS 180/0.01 et seq.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Dnaielle Hollenbeck-Pringle, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count II: Survival Action Against Dr. Hollenbeck-Pringle

1-16. The Plaintiff repeats, re-alleges and specifically incorporates paragraphs 1 through 16 of Count I of this Complaint.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hollenbeck-Pringle, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses.

18. The Plaintiff, Patrice Brown was appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, and brings this action pursuant to the provisions of 755 ILCS 5/27-6, commonly known as the Survival Act of Illinois.

19. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hollenbeck-Pringle, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and

disfigurement, medical and related expenses, and Tayon would have been entitled to recover from these injuries, had he survived.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Dnaielle Hollenbeck-Pringle, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count III: Wrongful Death Against Dr. Hinz

1. On March 27, 2023, Patrice Brown (hereinafter, “Patrice”) gave birth to her son, Tayon Terry Lamar Brown (hereinafter “Tayon”).

2. Tayon died on May 24, 2023.

3. At all times relevant to this Complaint, the Defendant, Erica Hinz, MD (hereinafter “Dr. Hinz”) was a physician licensed to practice and practicing medicine in the State of Illinois.

4. At all times relevant to this Complaint, Dr. Hinz had a duty to her patient, Patrice, and her unborn son, Tayon, to comply with the standard of care for a reasonably careful physician in the field of obstetrics and gynecology.

5. At all times relevant to this Complaint, Dr. Hinz had a duty to act as a reasonably careful physician to exercise due care and caution in the examination, diagnosis, treatment and management of Patrice’s pregnancy.

6. On or about March 24, 2023, Patrice presented to the University of Illinois Hospital with a three-day history of nausea, vomiting and contractions.

7. On or about March 24, 2023, and/or March 25, 2023, Dr. Hinz provided gynecological, obstetrical, and other medical services to Patrice at the University of Illinois Hospital.

8. On or about March 24, 2023 and/or March 25, 2023, Dr. Hinz knew or should have known that Patrice required additional supervision due to classification as a high-risk pregnancy.

9. On or about March 24, 2023 and/or March 25, 2023, while at the University of Illinois Hospital, Dr. Hinz knew or should have known that Patrice was having uterine contractions.

10. On or about March 24, 2023 and/or March 25, 2023, Dr. Hinz examined Patrice and found her to be 1 centimeter dilated.

11. On or about March 24, 2023 and/or March 25, 2023, while at the University of Illinois Hospital, Dr. Hinz knew or should have known that Patrice's tocodynamometer indicated fetal "irritability."

12. On or about March 24, 2023 and/or March 25, 2023, while at the University of Illinois Hospital, Dr. Hinz knew or should have known that a speculum exam indicated that Patrice had significant vaginal redundancy and that the cervix was not visualized.

13. On or about March 24, 2023 and/or March 25, 2023, while at the University of Illinois Hospital, Dr. Hinz knew or should have known that Patrice was noted to have a "white thick discharge."

14. On or about March 25, 2023, Dr. Hinz discharged Patrice home with orders to follow-up with her primary obstetrician in one week.

15. On or about March 27, 2023, Patrice called for an Uber ride to return to the University of Illinois Hospital due to increased contractions and abdominal pain. While attempting to enter the vehicle, Patrice gave birth to Tayon in front of her house.

16. On or about March 24, 2023 and/or March 24, 2023 and/or all relevant times herein, Dr. Hinz deviated from the standard of care required of her and was negligent in one or more of the following acts and/or omissions:

- (a) failed to properly examine, diagnose, monitor and treat Patrice;
- (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
- (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
- (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
- (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;
- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;
- (h) failed to conduct an appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;
- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;

- (l) failed to supervise and monitor the care provided by residents, nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriate document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hinz, Tayon suffered injuries of a personal, physical and pecuniary nature resulting in his death on or about May 24, 2023.

18. As a direct and proximate result of the foregoing negligent acts and/or omissions, the survivors of Tayon sustained substantial pecuniary loss, including but not limited to the loss of Tayon's love; society; companionship; money, benefits, goods and/or services he was likely to contribute in the future; the instruction, moral training, and/or superintendence of education he might reasonably have been expected to give his family in the future; and grief, sorrow and mental suffering damages.

19. At all times relevant, Patrice was the mother of Tayon.

20. Patrice Brown has been appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased.

21. This cause of action is being brought pursuant to the Illinois Wrongful Death Act, 740 ILCS 180/0.01 et seq.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Erica Hinz, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff

for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count IV: Survival Action Against Dr. Hinz

1-16. The Plaintiff repeats, re-alleges and specifically incorporates paragraphs 1 through 16 of Count III of this Complaint.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hinz, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses.

18. The Plaintiff, Patrice Brown was appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, and brings this action pursuant to the provisions of 755 ILCS 5/27-6, commonly known as the Survival Act of Illinois.

19. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Hinz, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses, and Tayon would have been entitled to recover from these injuries, had he survived.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Erica Hinz, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count V: Wrongful Death Against Dr. Butler

1. On March 27, 2023, Patrice Brown (hereinafter, “Patrice”) gave birth to her son, Tayon Terry Lamar Brown (hereinafter “Tayon”).
2. Tayon died on May 24, 2023.
3. At all times relevant to this Complaint, the Defendant, Leah Butler, MD (hereinafter “Dr. Butler”) was a physician licensed to practice and practicing medicine in the State of Illinois.
4. At all times relevant to this Complaint, Dr. Butler had a duty to her patient, Patrice, and her unborn son, Tayon, to comply with the standard of care for a reasonably careful physician in the field of obstetrics and gynecology.
5. At all times relevant to this Complaint, Dr. Butler had a duty to act as a reasonably careful physician to exercise due care and caution in the examination, diagnosis, treatment and management of Patrice’s pregnancy.
6. On or about March 27, 2023, Patrice again presented to the University of Illinois Hospital with concern for continued contractions which had increased in intensity since her March 24, 2023 examination at the University of Illinois Hospital.
7. On or about March 27, 2023, Dr. Butler provided gynecological, obstetrical, and other medical services to Patrice at the University of Illinois Hospital.
8. On or about March 27, 2023, Dr. Butler charted Patrice required supervision of high-risk pregnancy.
9. On or about March 27, 2023, Dr. Butler charted Patrice was having contractions which had increased in intensity since Patrice’s March 24, 2023 and/or March 25, 2023 examination at the University of Illinois Hospital.

10. On or about March 27, 2023, Dr. Butler examined Patrice and found her to be 1 centimeter dilated.

11. On or about March 27, 2023, Dr. Butler performed a speculum examination and charted that Patrice has significant vaginal redundancy and that the cervix was not visualized.

12. On or about March 27, 2023, Dr. Butler charted that Patrice was exhibiting vaginal discharge.

13. On or about March 27, 2023, Dr. Butler charted that Patrice felt “fluid leaking” while she was attempting to go to the bathroom at the University of Illinois Hospital.

14. On or about March 27, 2023, Dr. Butler charted that she determined Patrice was not in labor and/or had ruptured membranes and discharged Patrice home.

15. Later in the evening of March 27, 2023, Patrice called for an Uber ride to return to the University of Illinois Hospital due to increased contractions and abdominal pain. While attempting to enter the vehicle, Patrice gave birth to Tayon in front of her house.

16. On or about March 27, 2023 and/or all relevant times herein, Dr. Butler deviated from the standard of care required of her and was negligent in one or more of the following acts and/or omissions:

- (a) failed to properly examine, diagnose, monitor and treat Patrice;
- (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
- (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
- (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
- (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;

- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;
- (h) failed to conduct an appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;
- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;
- (l) failed to supervise and monitor the care provided by nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriately document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Butler, Tayon suffered injuries of a personal, physical and pecuniary nature resulting in his death on or about May 24, 2023.

18. As a direct and proximate result of the foregoing negligent acts and/or omissions, the survivors of Tayon sustained substantial pecuniary loss, including but not limited to the loss of Tayon's love; society; companionship; money, benefits, goods and/or services he was likely to contribute in the future; the instruction, moral training, and/or superintendence of education he

might reasonably have been expected to give his family in the future; and grief, sorrow and mental suffering damages.

19. At all times relevant, Patrice was the mother of Tayon.

20. Patrice Brown has been appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased.

21. This cause of action is being brought pursuant to the Illinois Wrongful Death Act, 740 ILCS 180/0.01 et seq.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Leah Butler, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count VI: Survival Action Against Dr. Butler

1-16. The Plaintiff repeats, re-alleges and specifically incorporates paragraphs 1 through 16 of Count V of this Complaint.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Butler, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses.

18. The Plaintiff, Patrice Brown was appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, and brings this action pursuant to the provisions of 755 ILCS 5/27-6, commonly known as the Survival Act of Illinois.

19. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Butler, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses, and Tayon would have been entitled to recover from these injuries, had he survived.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Leah Butler, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count VII: Wrongful Death Against Dr. Locher

1. On March 27, 2023, Patrice Brown (hereinafter, “Patrice”) gave birth to her son, Tayon Terry Lamar Brown (hereinafter “Tayon”).

2. Tayon died on May 24, 2023.

3. At all times relevant to this Complaint, the Defendant, Stephen Locher, MD (hereinafter “Dr. Locher”) was a physician licensed to practice and practicing medicine in the State of Illinois.

4. At all times relevant to this Complaint, Dr. Locher had a duty to her patient, Patrice, and her unborn son, Tayon, to comply with the standard of care for a reasonably careful physician in the field of obstetrics and gynecology.

5. At all times relevant to this Complaint, Dr. Locher had a duty to act as a reasonably careful physician to exercise due care and caution in the examination, diagnosis, treatment and

management of Patrice's pregnancy.

6. On or about March 27, 2023, Patrice again presented to the University of Illinois Hospital with concern for continued contractions which had increased in intensity since her March 24, 2023 and/or March 25, 2023 examination at the University of Illinois Hospital.

7. On or about March 27, 2023, Dr. Locher provided gynecological, obstetrical, and other medical services to Patrice at the University of Illinois Hospital.

8. On or about March 27, 2023, Dr. Locher knew or should have known that Patrice required supervision of high-risk pregnancy.

9. On or about March 27, 2023, Dr. Locher charted that Patrice was having contractions and knew or should have known that these contractions had increased in intensity in the period following Patrice's March 24, 2023 and/or March 25, 2023 examination at the University of Illinois Hospital.

10. On or about March 27, 2023, Dr. Locher knew or should have known that Patrice was 1 centimeter dilated.

11. On or about March 27, 2023, while at the University of Illinois Hospital, Dr. Locher knew or should have known that Patrice had significant vaginal redundancy and that the cervix was not visualized.

12. On or about March 27, 2023, while at the University of Illinois Hospital, Dr. Locher knew or should have known that Patrice was exhibiting vaginal discharge.

13. On or about March 27, 2023, while at the University of Illinois Hospital, Dr. Locher knew or should have known that Patrice felt "fluid leaking" while she was attempting to go to the bathroom at the University of Illinois Hospital.

14. On or about March 27, 2023, Dr. Locher determined that Patrice was not in labor

and/or had ruptured membranes and discharged Patrice home.

15. Later in the evening of March 27, 2023, Patrice called for an Uber ride to return to the University of Illinois Hospital due to increased contractions and abdominal pain. While attempting to enter the vehicle, Patrice gave birth to Tayon in front of her house.

16. On or about March 27, 2023 and/or all relevant times herein, Dr. Locher deviated from the standard of care required of him and was negligent in one or more of the following acts and/or omissions:

- (a) failed to properly examine, diagnose, monitor and treat Patrice;
- (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
- (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
- (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
- (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;
- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;
- (h) failed to conduct an appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;

- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;
- (l) failed to supervise and monitor the care provided by residents, nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriate document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Locher, Tayon suffered injuries of a personal, physical and pecuniary nature resulting in his death on or about May 24, 2023.

18. As a direct and proximate result of the foregoing negligent acts and/or omissions, the survivors of Tayon sustained substantial pecuniary loss, including but not limited to the loss of Tayon's love; society; companionship; money, benefits, goods and/or services he was likely to contribute in the future; the instruction, moral training, and/or superintendence of education he might reasonably have been expected to give his family in the future; and grief, sorrow and mental suffering damages.

19. At all times relevant, Patrice was the mother of Tayon.

20. Patrice Brown has been appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased.

21. This cause of action is being brought pursuant to the Illinois Wrongful Death Act, 740 ILCS 180/0.01 et seq.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Stephen Locher, MD for an amount in excess

of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count VIII: Survival Action Against Dr. Locher

1-16. The Plaintiff repeats, re-alleges and specifically incorporates paragraphs 1 through 16 of Count VII of this Complaint.

17. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Locher, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses.

18. The Plaintiff, Patrice Brown was appointed Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, and brings this action pursuant to the provisions of 755 ILCS 5/27-6, commonly known as the Survival Act of Illinois.

19. As a direct and proximate result of one or more of these negligent acts and/or omissions by the Defendant, Dr. Locher, Tayon suffered injuries of a personal, physical and pecuniary nature, including but not limited to, pain and suffering, disability and disfigurement, medical and related expenses, and Tayon would have been entitled to recover from these injuries, had he survived.

WHEREFORE Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, seeks judgment against Defendant Stephen Locher, MD for an amount in excess of the jurisdictional minimum of this Court that will fairly and adequately compensate the Plaintiff

for her damages and injuries, together with costs of this suit, prejudgment interest and such other relief as the Court may deem proper and just.

Count IX: Respondents in Discovery

1. The Respondents in Discovery, Diane Lyman, PA-C, Roseland Community Hospital Association, Ann & Robert H. Lurie Children’s Hospital of Chicago, and Northwestern Memorial Hospital, are believed by Plaintiff to have information essential to the determination of who should properly be named as additional Defendants in this action and are being named as a Respondents in Discovery so that they may be requested to respond to discovery pursuant to 735 ILCS 5/2-402, see attached Exhibit B.

Plaintiff, Plaintiff Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, Deceased, requests the Respondents in Discovery, Diane Lyman, PA-C, Roseland Community Hospital Association, Ann & Robert H. Lurie Children’s Hospital of Chicago, and Northwestern Memorial Hospital, respond to discovery initiated pursuant to the provisions of the applicable Illinois Statutes and provide available date for which to be deposed in this matter.

Respectfully submitted,

/s/ Brian Shactman
Brian Shactman

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

AFFIDAVIT

I, Brian Shactman, having come to be sworn duly under oath, hereby state and affirm as follows:

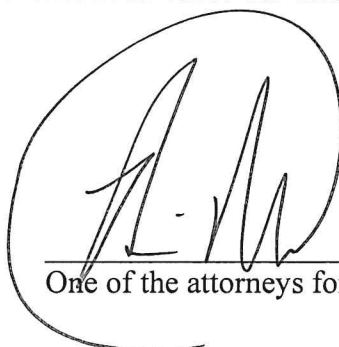
1. I am one of the attorneys for the Plaintiff and have personal knowledge of the facts stated herein.
2. I have consulted and reviewed the facts of the case with a professional I reasonably believe is knowledgeable in the relevant issues involved in this particular action, practices or has practiced within the last six years in the same area of healthcare and medicine at issue in this particular action and is qualified by experience and demonstrated competence in the subject of this case.

3. The reviewing physician has determined in a written report, after a review of the medical records and other relevant material involved in this particular action, that there is a reasonable and meritorious cause for the filing of this action.

4. I have concluded on the basis of the reviewing health professional's review and consultation that there is a reasonable and meritorious cause for the filing of such action.

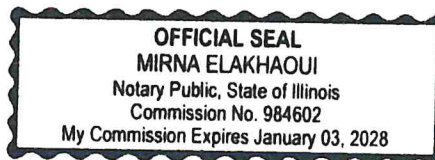
5. A copy of the Report is attached as Exhibit A and clearly identifies the reasons for the professional's determination that a reasonable and meritorious cause for filing such action exists.

FURTHER AFFIANT SAYETH NOT.


One of the attorneys for Plaintiff

SUBSCRIBED AND SWORN TO
before me this 8th day of March, 2024


Notary Public



ROSENBERG, EISENBERG & ASSOCIATES, LLC

2340 S. Arlington Heights Road, Suite 460

Arlington Heights, Illinois 60005

Tel.: (847) 640-1676

Fax: (847) 621-2600

Email: brian@re-injurylaw.com

Attorney No. 42480

Re: Patrice Brown/Tayon Bown vs. Danielle Hollenbeck-Pringle, MD and Erica Hinz, MD

HEALTH PROFESSIONAL'S REPORT

1. I am a physician licensed to practice medicine in all its branches and practice or teach in the area of medicine applicable in this case.
2. I am familiar with the standard of care for physicians, hospitals and medical facilities as it currently relates to issues of care and treatment of pregnant women such as Patrice Brown presenting on an emergency basis for obstetric concerns including, but not limited to, monitoring, diagnosis, care and treatment of abnormal maternal fetal signs and/or preterm labor.
3. I have read and reviewed documents, medical records and radiology images including, but not limited to the following records in this case:
 - (a) Death Certificate
 - (b) University of Illinois Hospital
 - (c) Diane Lyman, PA-C
 - (d) Roseland Community Hospital
 - (e) Northwestern Memorial Hospital
 - (f) Lurie Childrens Hospital
 - (g) Autopsy Report
 - (h) Photographs and videos including front door video capturing the birth
4. Based upon my experience, training, knowledge, and review of the above records, it is my opinion, to a reasonable degree of medical certainty, that the care provided to Patrice Brown by Dr. Hollenbeck-Pringle and Dr. Hinz fell below the minimum standard of care and constituted negligence due to the following acts and omissions:
 - (a) failed to properly examine, diagnose, monitor and treat Patrice;
 - (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
 - (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
 - (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
 - (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;

EXHIBIT A

- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;
- (h) failed to conduct an appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;
- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;
- (l) failed to supervise and monitor the care provided by nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriately document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

5. Dr. Hollenbeck-Pringle and Dr. Hinz fell below the minimum standard of care and constituted negligence for failing to recognize signs and symptoms of preterm labor when Patrice Brown presented to the OBED at the University of Illinois Hospital on March 24, 2023. Ms. Brown, who was approximately 25 weeks pregnant and classified as a high risk pregnancy, arrived at the hospital complaining of nausea, vomiting and persistent contractions. These symptoms were confirmed by medical staff including Dr. Hollenbeck-Pringle and Dr. Hinz. A speculum examination also revealed significant vaginal redundancy and a white thick discharge. The cervix could not be visualized and Ms. Brown was evaluated as being 1cm dilated. Despite this presentation, Dr. Hollenbeck-Pringle and Dr. Hinz failed to order the appropriate workup to reach an appropriate diagnosis, including, but not limited to, ultrasound imaging, proper laboratory and other testing and/or appropriate medications. Rather than admitting Ms. Brown to the hospital for further observation, monitoring, care and/or treatment, Dr. Hollenbeck-Pringle and Dr. Hinz discharged her home with orders to follow-up with her OBGYN in one week. Three days later, while attempting to enter an Uber to return to the hospital due to persistent and worsening symptoms, Ms. Brown gave birth to Tayon in front of her house.

6. These standard of care violations caused or contributed to Tayon's premature and unsterile birth leading to numerous and severe medical complications which caused or contributed to his death approximately two months later on May 24, 2023.
7. In my opinion, there is a reasonable and meritorious basis for filing a cause of action against Dr. Hollenbeck-Pringle and Dr. Hinz. I reserve the right to make additions and deletions to these opinions as discovery progresses in this matter. This document is solely meant to satisfy the gate keeping function of 735 ILCS 5/2-622 and in no way incorporates all of the opinions I have in the matter.

Redacted

Signature

March 7, 2024

Date

Physician

Profession

Attorney No. 42480

Re: Patrice Brown/Tayon Bown vs. Leah Butler, MD, and Stephen Locher, MD

HEALTH PROFESSIONAL'S REPORT

1. I am a physician licensed to practice medicine in all its branches and practice or teach in the area of medicine applicable in this case.
2. I am familiar with the standard of care for physicians, hospitals and medical facilities as it currently relates to issues of care and treatment of pregnant women such as Patrice Brown presenting on an emergency basis for obstetric concerns including, but not limited to, monitoring, diagnosis, care and treatment of abnormal maternal fetal signs and/or preterm labor.
3. I have read and reviewed documents, medical records and radiology images including, but not limited to the following records in this case:
 - (i) Death Certificate
 - (j) University of Illinois Hospital
 - (k) Diane Lyman, PA-C
 - (l) Roseland Community Hospital
 - (m) Northwestern Memorial Hospital
 - (n) Lurie Childrens Hospital
 - (o) Autopsy Report
 - (p) Photographs and videos including front door video capturing the birth
4. Based upon my experience, training, knowledge, and review of the above records, it is my opinion, to a reasonable degree of medical certainty, that the care provided to Patrice Brown by Dr. Butler and Dr. Locher fell below the minimum standard of care and constituted negligence due to the following acts and omissions:
 - (a) failed to properly examine, diagnose, monitor and treat Patrice;
 - (b) failed to follow applicable hospital, clinic and facility rules, regulations, policies, procedures, protocols and standards in diagnosing and treating Patrice;
 - (c) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of preterm labor;
 - (d) failed to properly examine, diagnose, monitor and treat Patrice for signs and symptoms of cervical insufficiency;
 - (e) failed to order an ultrasound and/or other image to aid in the diagnosis and treatment of Patrice;

- (f) failed to order appropriate medications to aid in the diagnosis and treatment of Patrice;
- (g) failed to order timely and appropriate laboratory studies to aid in the diagnosis and treatment of Patrice;
- (h) failed to conduct an appropriate examination to visualize Patrice's cervix;
- (g) failed to admit, monitor and treat Patrice;
- (h) failed to protect the health of Patrice's unborn son, Tayon;
- (i) failed to use proper skill and knowledge in the examination, diagnosis and treatment of Patrice;
- (j) failed to adequately assess and monitor Patrice's condition;
- (k) discharged Patrice without performing an appropriate differential diagnosis to rule out cervical insufficiency and/or preterm labor;
- (l) failed to supervise and monitor the care provided by nurses and/or other medical personnel caring for Patrice;
- (m) failed to appropriately document assessments and treatment plans for Patrice;
- (n) provided inadequate treatment to Patrice; and
- (o) was otherwise negligent in the treatment and care of Patrice.

5. Dr. Butler and Dr. Locher fell below the minimum standard of care and constituted negligence for failing to recognize signs and symptoms of preterm labor when Patrice Brown presented to the OBED at the University of Illinois Hospital on March 27, 2023. Ms. Brown, who was approximately 25 weeks pregnant and classified as a high risk pregnancy, arrived at the hospital complaining of worsening contractions following an earlier visit to the same facility on March 23, 2023. These symptoms were confirmed by medical staff including Dr. Butler and Dr. Locher who also documented that the contractions were "picking back up" while in the OBED. A speculum examination also revealed significant vaginal redundancy and a thin discharge. The cervix could not be visualized and Ms. Brown was evaluated as being 1cm dilated. While attempting to use the bathroom at the facility, Ms. Brown reported fluid leakage. Despite this presentation, Dr. Butler and Dr. Locher failed to order the appropriate workup to reach an appropriate diagnosis, including, but not limited to, ultrasound imaging, proper laboratory and other testing and/or appropriate medications. Rather than admitting Ms. Brown to the hospital for further observation, monitoring, care and/or treatment, Dr. Butler and Dr. Locher discharged her home. Later that evening, while attempting to enter an Uber to return to the

hospital due to persistent and worsening symptoms, Ms. Brown gave birth to Tayon in front of her house.

6. These standard of care violations caused or contributed to Tayon's premature and unsterile birth leading to numerous and severe medical complications which caused or contributed to his death approximately two months later on May 24, 2023.
7. In my opinion, there is a reasonable and meritorious basis for filing a cause of action against Dr. Butler and Dr. Locher. I reserve the right to make additions and deletions to these opinions as discovery progresses in this matter. This document is solely meant to satisfy the gate keeping function of 735 ILCS 5/2-622 and in no way incorporates all of the opinions I have in the matter.

Redacted

Signature

March 7, 2024

Date

Physician

Profession

Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,

Plaintiff,

versus

DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,

Defendants, and

DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL

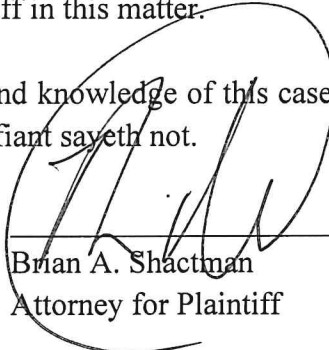
Respondents in Discovery.

Court No.

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(b)

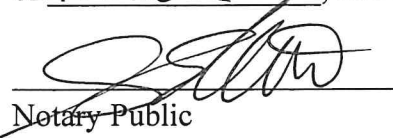
I, Brian A. Shactman, having come to be sworn duly under oath, hereby state and affirm as follows:

1. That I am the attorney for the Plaintiff in this matter.
2. That based upon my investigation and knowledge of this case Plaintiff is seeking money damages in excess of \$50,000.00, further affiant sayeth not.



Brian A. Shactman
Attorney for Plaintiff

SUBSCRIBED AND SWORN TO
before me this 8th day
of March, 2024.



Notary Public

OFFICIAL SEAL
MIRNA ELAKHAOUI
Notary Public, State of Illinois
Commission No. 984602
My Commission Expires January 03, 2028

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator for
the Estate of TAYON TERRY LAMAR BROWN,
deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD, ERICA
HINZ, MD, LEAH BUTLER, MD, and STEPHEN
LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND COMMUNITY
HOSPITAL ASSOCIATION, ANN & ROBERT H.
LURIE CHILDREN'S HOSPITAL OF CHICAGO, and
NORTHWESTERN MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

INTERROGATORIES TO RESPONDENT IN DISCOVERY DIANE LYMAN, PA-C

NOW COMES the Plaintiff, Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following interrogatories to be Answered in writing and under oath by Respondent in Discovery, Diane Lyman, PA-C.

1. State the full name, residence and business address, occupation, and office held of the person signing the answer and similar information for all individuals providing information or assisting in the preparation of these answers. With respect to the signer, please state whether a diligent search was made of all records, books, memoranda, and papers of Diane Lyman's practice, and whether a diligent inquiry was made of all individuals providing information or assisting in the preparation of these answers.

ANSWER:

2. Please state all dates you provided services of any kind to Patrice Brown, the nature of the service, whether any referrals for care were provided and the specific care for which Patrice Brown was being referred. Additionally, please provide the date of each and every cervical exam of any kind related to Patrice Brown's pregnancy.

EXHIBIT B

ANSWER:

3. Please state all reasons you considered Patrice Brown a high-risk pregnancy and any changes or additions to her care, treatment and monitoring as a result of this designation.

ANSWER:

4. Please state each date and time you became aware of any complications related to Patrice Brown's pregnancy and provide the method of notification and any actions you took in response to these concerns.

ANSWER:

5. When did you first learn that Patrice Brown was in premature labor and/or had a premature delivery. Additionally, please provide, if known, any and all causes of Patrice Brown's premature delivery.

ANSWER:

6. Does the respondent have any information or knowledge that Patrice Brown refused medical treatment or medical recommendations at any time while under the care of the Respondent or any other individual providing care and treatment for her pregnancy? If yes, please provide the dates of said refusal, the treatment being refused and the names of any medical providers with knowledge of said refusal.

ANSWER:

7. Have you had any communication of any kind with any party and/or respondent to this action regarding Patrice Brown and/or Tayon Brown? If the answer is yes, please provide the date of communication, type of communication and whether and the location of any documentation related to said communication.

ANSWER:

8. Were you named or covered under any policy or policies of liability insurance at the time of the care and treatment alleged in the complaint? If so, state for each policy:

- a. The name of the insurance company;
- b. The policy number;
- c. The effective policy period;
- d. The maximum liability limits for each person and each occurrence, including umbrella and excess liability coverage; and
- e. The named insured(s) under the policy.

ANSWER:

9. Please identify any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of your care and treatment of Patrice Brown and/or Tayon Brown related to any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, suspected contractions, vaginal discharge, vaginal redundancy, cervical insufficiency, premature labor, premature rupture of membranes, cervical dilation, communication and/or documentation regarding patient concerns.

ANSWER:

10. Do you know of any statements made by any person relating to the care and treatment of Patrice Brown, Tayon Brown or the damages alleged of in the complaint? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written or oral and if written the present location of each such statement.

ANSWER:

11. State whether or not any personnel involved in the care and treatment of Patrice Brown and/or Tayon Brown was ever involved in any proceedings regarding termination, suspension, or revocation of medical/hospital privileges and if so, identify the individual, their position, the organization or group conducting the proceeding, and the results of such proceedings.

ANSWER:

12. State whether investigations, reviews, hearings or any process dealing with mortality or morbidity were held at any time related to the Respondent concerning Patrice Brown and/or Tayon Brown's care and treatment and by whom they were held, who attended, whether they were recorded or reduced to writing and what, if any, results or recommendations were obtained.

ANSWER:

13. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

ANSWER:

Respectfully submitted,

/s/ Brian Shactman _____

Brian Shactman

Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC

2340 S. Arlington Heights Road, Suite 460

Arlington Heights, Illinois 60005

Tel.: (847) 640-1676

Fax: (847) 621-2600

Email: brian@re-injurylaw.com

Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

**REQUESTS TO PRODUCE TO RESPONDENT
IN DISCOVERY DIANE LYMAN, PA-C**

NOW COMES the Plaintiff, Patrice Brown, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following Requests to Produce to be Answered in writing and under oath by Respondent in Discovery, Diane Lyman, PA-C.

1. Any and all statements, notes, correspondence, reports, and/or other documents related to Patrice Brown, Tayon Brown and/or the events identified in the Complaint.

RESPONSE:

2. The complete medical chart and billing file for Patrice Brown including any and all correspondence, ultrasound, radiology images and/or other written material of any kind.

RESPONSE:

3. Excluding what was produced in response to Document Request 2, any and all additional, if any, data or written records or documents concerning the physical and mental condition, diagnosis or treatment of Patrice Brown and/or Tayon Brown from January 1, 2015 through the present, including any drafts, notes, dictations, recordings or other writings.

RESPONSE:

4. All correspondence to or from the Respondent to any party regarding or referring Patrice Brown, Tayon Brown, their diagnoses, care, treatment, or this lawsuit.

RESPONSE:

5. All documents evidencing, relating or referring to any review, evaluation or critique concerning the care and treatment received by Patrice Brown and/or Tayon Brown.

RESPONSE:

6. Any and all documents relating to, referring to or containing the results or recommendations from any meeting of a medical committee, board, group or other entity regarding or referencing in any way the procedures followed for the care and treatment of Patrice Brown and/or Tayon Brown.

RESPONSE:

7. Any and all documents identifying any individuals who witnessed or have knowledge of the incident alleged in Plaintiffs' Complaint.

RESPONSE:

8. Copies of any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of the care and treatment of Patrice Brown and/or Tayon Brown related to any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, suspected contractions, vaginal discharge, vaginal redundancy, cervical insufficiency, premature labor, premature rupture of membranes, cervical dilation, communication and/or documentation regarding patient concerns.

RESPONSE:

9. All documents mentioned or identified in your answer to Plaintiffs' interrogatories.

RESPONSE:

10. A log identifying any documents known to you and requested by any of the foregoing interrogatories or production requests which you claim to be work product or subject to any common law or statutory privilege, and with respect to each document, specify the title and type of document, date, author(s) name(s), name(s) and position(s) of anyone who received or reviewed the document and a brief description of the information contained and the legal basis for the claim for the claim of privilege.

RESPONSE:

Respectfully submitted,

/s/ Brian Shactman

Brian Shactman

Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC

2340 S. Arlington Heights Road, Suite 460

Arlington Heights, Illinois 60005

Tel.: (847) 640-1676

Fax: (847) 621-2600

Email: brian@re-injurylaw.com

Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator for
the Estate of TAYON TERRY LAMAR BROWN,
deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD, ERICA
HINZ, MD, LEAH BUTLER, MD, and STEPHEN
LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND COMMUNITY
HOSPITAL ASSOCIATION, ANN & ROBERT H.
LURIE CHILDREN'S HOSPITAL OF CHICAGO, and
NORTHWESTERN MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

**INTERROGATORIES TO RESPONDENT IN
DISCOVERY ROSELAND COMMUNITY HOSPITAL**

NOW COMES the Plaintiff, Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following interrogatories to be Answered in writing and under oath by Respondent in Discovery, Roseland Community Hospital.

1. State the full name, residence and business address, occupation, and office held of the person signing the answer and similar information for all individuals providing information or assisting in the preparation of these answers. With respect to the signer, please state whether a diligent search was made of all records, books, memoranda, and papers of Roseland Community Hospital, and whether a diligent inquiry was made of all individuals providing information or assisting in the preparation of these answers.

ANSWER:

2. Please state all dates you provided services of any kind to Patrice Brown and/or Tayon Brown, the nature of the service, whether any referrals for care were provided and the specific care for which Patrice Brown and/or Tayon Brown was being referred.

ANSWER:

3. Were you or anyone acting on your behalf able to determine the cause of Patrice Brown's premature delivery and, if known, please state any and all causes of Patrice Brown's premature delivery.

ANSWER:

4. Does the respondent have any information or knowledge that Patrice Brown refused medical treatment or medical recommendations at any time while under the care of the Respondent or any other individual providing care and treatment for her pregnancy? If yes, please provide the dates of said refusal, the treatment being refused and the names of any medical providers with knowledge of said refusal.

ANSWER:

5. Identify by name, address, title and position the employee(s) with the most knowledge regarding Patrice Brown and/or Tayon Brown care and treatment at your facility. If said individual(s) are no longer employed with your facility, please state their last known address, date of birth and social security number:

ANSWER:

6. Have you had any communication of any kind with any party and/or respondent to this action regarding Patrice Brown and/or Tayon Brown? If the answer is yes, please provide the date of communication, type of communication and whether and the location of any documentation related to said communication.

ANSWER:

7. Were you named or covered under any policy or policies of liability insurance at the time of the care and treatment alleged in the complaint? If so, state for each policy:

- a. The name of the insurance company;
- b. The policy number;
- c. The effective policy period;
- d. The maximum liability limits for each person and each occurrence, including umbrella and excess liability coverage; and
- e. The named insured(s) under the policy.

ANSWER:

8. Please identify any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of your care and treatment of Patrice Brown and/or Tayon Brown related to any medical

conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, and monitoring and treatment of patients requiring labor and delivery and post-partum care.

ANSWER:

9. Do you know of any statements made by any person relating to the care and treatment of Patrice Brown, Tayon Brown and/or the damages alleged of in the complaint? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written or oral and if written the present location of each such statement.

ANSWER:

10. State whether or not any personnel involved in the care and treatment of Patrice Brown and/or Tayon Brown was ever involved in any proceedings regarding termination, suspension, or revocation of medical/hospital privileges and if so, identify the individual, their position, the organization or group conducting the proceeding, and the results of such proceedings.

ANSWER:

11. State whether investigations, reviews, hearings or any process dealing with mortality or morbidity were held at any time related to the Respondent concerning Patrice Brown and/or Tayon Brown's care and treatment and by whom they were held, who attended, whether they were recorded or reduced to writing and what, if any, results or recommendations were obtained.

ANSWER:

12. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

ANSWER:

Respectfully submitted,

/s/ Brian Shactman
Brian Shactman
Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC
2340 S. Arlington Heights Road, Suite 460
Arlington Heights, Illinois 60005
Tel.: (847) 640-1676
Fax: (847) 621-2600
Email: brian@re-injurylaw.com
Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

**REQUESTS TO PRODUCE TO RESPONDENT
IN DISCOVERY ROSELAND COMMUNITY HOSPITAL**

NOW COMES the Plaintiff, Patrice Brown, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following Requests to Produce to be Answered in writing and under oath by Respondent in Discovery, Roseland Community Hospital.

1. Any and all statements, notes, correspondence, reports, and/or other documents related to Patrice Brown, Tayon Brown and/or the events identified in the Complaint.

RESPONSE:

2. The complete medical chart and billing file for Patrice Brown and/or Tayon Brown including any and all correspondence, ultrasound, radiology images and/or other written material of any kind.

RESPONSE:

3. Excluding what was produced in response to Document Request 2, any and all additional, if any, data or written records or documents concerning the physical and mental condition, diagnosis or treatment of Patrice Brown and/or Tayon Brown from January 1, 2015 through the present, including any drafts, notes, dictations, recordings or other writings.

RESPONSE:

4. All correspondence to or from the Respondent to any party regarding or referring Patrice Brown, Tayon Brown, their diagnoses, care, treatment, or this lawsuit.

RESPONSE:

5. All documents evidencing, relating or referring to any review, evaluation or critique concerning the care and treatment received by Patrice Brown and/or Tayon Brown.

RESPONSE:

6. Any and all documents relating to, referring to or containing the results or recommendations from any meeting of a medical committee, board, group or other entity regarding or referencing in any way the procedures followed for the care and treatment of Patrice Brown and/or Tayon Brown.

RESPONSE:

7. Any and all documents identifying any individuals who witnessed or have knowledge of the incident alleged in Plaintiffs' Complaint.

RESPONSE:

8. Copies of any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of the of the care and treatment of Patrice Brown and/or Tayon Brown related to any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, and monitoring and treatment of patients requiring labor and delivery and post-partum care.

RESPONSE:

9. All documents mentioned or identified in your answer to Plaintiffs' interrogatories.

RESPONSE:

10. A log identifying any documents known to you and requested by any of the foregoing interrogatories or production requests which you claim to be work product or subject to any common law or statutory privilege, and with respect to each document, specify the title and type of document, date, author(s) name(s), name(s) and position(s) of anyone who received or reviewed the document and a brief description of the information contained and the legal basis for the claim for the claim of privilege.

RESPONSE:

Respectfully submitted,

/s/ Brian Shactman
Brian Shactman
Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC
2340 S. Arlington Heights Road, Suite 460
Arlington Heights, Illinois 60005
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Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator for
the Estate of TAYON TERRY LAMAR BROWN,
deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD, ERICA
HINZ, MD, LEAH BUTLER, MD, and STEPHEN
LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND COMMUNITY
HOSPITAL ASSOCIATION, ANN & ROBERT H.
LURIE CHILDREN'S HOSPITAL OF CHICAGO, and
NORTHWESTERN MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

INTERROGATORIES TO RESPONDENT IN DISCOVERY
ANN & ROBERT H. LURIE CHILDREN'S HOSPITAL OF CHICAGO

NOW COMES the Plaintiff, Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following interrogatories to be Answered in writing and under oath by Respondent in Discovery, Ann & Robert Lurie Children's Hospital of Chicago.

1. State the full name, residence and business address, occupation, and office held of the person signing the answer and similar information for all individuals providing information or assisting in the preparation of these answers. With respect to the signer, please state whether a diligent search was made of all records, books, memoranda, and papers of Ann & Robert Lurie Children's Hospital of Chicago, and whether a diligent inquiry was made of all individuals providing information or assisting in the preparation of these answers.

ANSWER:

2. Please state all dates you provided services of any kind to Patrice Brown and/or Tayon Brown, the nature of the service, whether any referrals for care were provided and the specific care for which Patrice Brown and/or Tayon Brown was being referred.

ANSWER:

3. Were you or anyone acting on your behalf able to determine the cause of Tayon Brown's death and, if known, please state any and all causes of Tayon Brown's premature death.

ANSWER:

4. Does the respondent have any information or knowledge that Patrice Brown refused medical treatment or medical recommendations at any time while Tayon Brown was under the care of the Respondent or any other individual providing care and treatment for her pregnancy? If yes, please provide the dates of said refusal, the treatment being refused and the names of any medical providers with knowledge of said refusal.

ANSWER:

5. Have you had any communication of any kind with any party and/or respondent to this action regarding Patrice Brown and/or Tayon Brown? If the answer is yes, please provide the date of communication, type of communication and whether and the location of any documentation related to said communication.

ANSWER:

6. Identify by name, address, title and position the employee(s) with the most knowledge regarding Patrice Brown and/or Tayon Brown care and treatment at your facility. If said individual(s) are no longer employed with your facility, please state their last known address, date of birth and social security number:

ANSWER:

7. Were you named or covered under any policy or policies of liability insurance at the time of the care and treatment alleged in the complaint? If so, state for each policy:

- a. The name of the insurance company;
- b. The policy number;
- c. The effective policy period;
- d. The maximum liability limits for each person and each occurrence, including umbrella and excess liability coverage; and
- e. The named insured(s) under the policy.

ANSWER:

8. Please identify any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of your care and treatment of Patrice Brown and/or Tayon Brown related to any medical

conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, respiratory and ventilator care for premature infants, infection control policies for premature infants, and monitoring, care and treatment of premature and/or ICU/NICU infants.

ANSWER:

9. Do you know of any statements made by any person relating to the care and treatment of Patrice Brown, Tayon Brown and/or the damages alleged of in the complaint? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written or oral and if written the present location of each such statement.

ANSWER:

10. State whether or not any personnel involved in the care and treatment of Patrice Brown and/or Tayon Brown was ever involved in any proceedings regarding termination, suspension, or revocation of medical/hospital privileges and if so, identify the individual, their position, the organization or group conducting the proceeding, and the results of such proceedings.

ANSWER:

11. State whether investigations, reviews, hearings or any process dealing with mortality or morbidity were held at any time related to the Respondent concerning Patrice Brown and/or Tayon Brown's care and treatment and by whom they were held, who attended, whether they were recorded or reduced to writing and what, if any, results or recommendations were obtained.

ANSWER:

12. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

ANSWER:

Respectfully submitted,

/s/ Brian Shactman
Brian Shactman
Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC
2340 S. Arlington Heights Road, Suite 460
Arlington Heights, Illinois 60005
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Fax: (847) 621-2600
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Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

REQUESTS TO PRODUCE TO RESPONDENT IN DISCOVERY
ANN & ROBERT H. LURIE CHILDREN'S HOSPITAL OF CHICAGO

NOW COMES the Plaintiff, Patrice Brown, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following Requests to Produce to be Answered in writing and under oath by Respondent in Discovery, Ann & Robert Lurie Children's Hospital of Chicago.

1. Any and all statements, notes, correspondence, reports, and/or other documents related to Patrice Brown, Tayon Brown and/or the events identified in the Complaint.

RESPONSE:

2. The complete medical chart and billing file for Patrice Brown and/or Tayon Brown including any and all correspondence, ultrasound, radiology images and/or other written material of any kind.

RESPONSE:

3. Excluding what was produced in response to Document Request 2, any and all additional, if any, data or written records or documents concerning the physical and mental condition, diagnosis or treatment of Patrice Brown and/or Tayon Brown from January 1, 2015 through the present, including any drafts, notes, dictations, recordings or other writings.

RESPONSE:

4. All correspondence to or from the Respondent to any party regarding or referring Patrice Brown, Tayon Brown, their diagnoses, care, treatment, or this lawsuit.

RESPONSE:

5. All documents evidencing, relating or referring to any review, evaluation or critique concerning the care and treatment received by Patrice Brown and/or Tayon Brown.

RESPONSE:

6. Any and all documents relating to, referring to or containing the results or recommendations from any meeting of a medical committee, board, group or other entity regarding or referencing in any way the procedures followed for the care and treatment of Patrice Brown and/or Tayon Brown.

RESPONSE:

7. Any and all documents identifying any individuals who witnessed or have knowledge of the incident alleged in Plaintiffs' Complaint.

RESPONSE:

8. Copies of any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of the of the care and treatment of Patrice Brown and/or Tayon Brown any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, respiratory and ventilator care for premature infants, infection control policies for premature infants, and monitoring, care and treatment of premature and/or ICU/NICU infants.

RESPONSE:

9. All documents mentioned or identified in your answer to Plaintiffs' interrogatories.

RESPONSE:

10. A log identifying any documents known to you and requested by any of the foregoing interrogatories or production requests which you claim to be work product or subject to any common law or statutory privilege, and with respect to each document, specify the title and type of document, date, author(s) name(s), name(s) and position(s) of anyone who received or reviewed the document and a brief description of the information contained and the legal basis for the claim for the claim of privilege.

RESPONSE:

Respectfully submitted,

/s/ Brian Shactman

Brian Shactman

Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC

2340 S. Arlington Heights Road, Suite 460

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Attorney No. 42480

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

**INTERROGATORIES TO RESPONDENT IN DISCOVERY
NORTHWESTERN MEMORIAL HOSPITAL**

NOW COMES the Plaintiff, Patrice Brown, as Independent Administrator of the Estate of Tayon Terry Lamar Brown, deceased, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following interrogatories to be Answered in writing and under oath by Respondent in Discovery, Northwestern Memorial Hospital.

1. State the full name, residence and business address, occupation, and office held of the person signing the answer and similar information for all individuals providing information or assisting in the preparation of these answers. With respect to the signer, please state whether a diligent search was made of all records, books, memoranda, and papers of Northwestern Memorial Hospital, and whether a diligent inquiry was made of all individuals providing information or assisting in the preparation of these answers.

ANSWER:

2. Please state all dates you provided services of any kind to Patrice Brown and/or Tayon Brown, the nature of the service, whether any referrals for care were provided and the specific care for which Patrice Brown and/or Tayon Brown was being referred.

ANSWER:

3. Were you or anyone acting on your behalf able to determine the cause of Tayon Brown's death and, if known, please state any and all causes of Tayon Brown's premature death.

ANSWER:

4. Were you or anyone acting on your behalf able to determine the cause of Patrice Brown's premature delivery and, if known, please state any and all causes of Patrice Brown's premature delivery.

ANSWER:

5. Does the respondent have any information or knowledge that Patrice Brown refused medical treatment or medical recommendations at any time while she and/or Tayon Brown was under the care of the Respondent or any other individual providing care and treatment for her pregnancy? If yes, please provide the dates of said refusal, the treatment being refused and the names of any medical providers with knowledge of said refusal.

ANSWER:

6. Identify by name, address, title and position the employee(s) with the most knowledge regarding Patrice Brown and/or Tayon Brown care and treatment at your facility. If said individual(s) are no longer employed with your facility, please state their last known address, date of birth and social security number:

ANSWER:

7. Have you had any communication of any kind with any party and/or respondent to this action regarding Patrice Brown and/or Tayon Brown? If the answer is yes, please provide the date of communication, type of communication and whether and the location of any documentation related to said communication.

ANSWER:

8. Were you named or covered under any policy or policies of liability insurance at the time of the care and treatment alleged in the complaint? If so, state for each policy:

- a. The name of the insurance company;
- b. The policy number;
- c. The effective policy period;
- d. The maximum liability limits for each person and each occurrence, including umbrella and excess liability coverage; and
- e. The named insured(s) under the policy.

ANSWER:

9. Please identify any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of your care and treatment of Patrice Brown and/or Tayon Brown related to any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, respiratory and ventilator care for premature infants, infection control policies for premature infants, and monitoring, care and treatment of premature and/or ICU/NICU infants.

ANSWER:

10. Do you know of any statements made by any person relating to the care and treatment of Patrice Brown, Tayon Brown and/or the damages alleged of in the complaint? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written or oral and if written the present location of each such statement.

ANSWER:

11. State whether or not any personnel involved in the care and treatment of Patrice Brown and/or Tayon Brown was ever involved in any proceedings regarding termination, suspension, or revocation of medical/hospital privileges and if so, identify the individual, their position, the organization or group conducting the proceeding, and the results of such proceedings.

ANSWER:

12. State whether investigations, reviews, hearings or any process dealing with mortality or morbidity were held at any time related to the Respondent concerning Patrice Brown and/or Tayon Brown's care and treatment and by whom they were held, who attended, whether they were recorded or reduced to writing and what, if any, results or recommendations were obtained.

ANSWER:

13. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

ANSWER:

Respectfully submitted,

/s/ Brian Shactman _____

Brian Shactman

Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC

2340 S. Arlington Heights Road, Suite 460

Arlington Heights, Illinois 60005

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Attorney No. 42480

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

**PATRICE BROWN, as Independent Administrator
for the Estate of TAYON TERRY LAMAR
BROWN, deceased,**

Plaintiff,

versus

**DANIELLE HOLLENBECK-PRINGLE, MD,
ERICA HINZ, MD, LEAH BUTLER, MD, and
STEPHEN LOCHER, MD,**

Defendants, and

**DIANE LYMAN, PA-C, ROSELAND
COMMUNITY HOSPITAL ASSOCIATION, ANN
& ROBERT H. LURIE CHILDREN'S HOSPITAL
OF CHICAGO, and NORTHWESTERN
MEMORIAL HOSPITAL**

Respondents in Discovery.

Court No.

REQUESTS TO PRODUCE TO RESPONDENT IN DISCOVERY
NORTHWESTERN MEMORIAL HOSPITAL

NOW COMES the Plaintiff, Patrice Brown, by and through her attorneys, Rosenberg, Eisenberg & Associates, LLC, and pursuant to the Illinois Code of Civil Procedure and the Rules of the Illinois Supreme Court, propound(s) the following Requests to Produce to be Answered in writing and under oath by Respondent in Discovery, Northwestern Memorial Hospital.

1. Any and all statements, notes, correspondence, reports, and/or other documents related to Patrice Brown, Tayon Brown and/or the events identified in the Complaint.

RESPONSE:

2. The complete medical chart and billing file for Patrice Brown and/or Tayon Brown including any and all correspondence, ultrasound, radiology images and/or other written material of any kind.

RESPONSE:

3. Excluding what was produced in response to Document Request 2, any and all additional, if any, data or written records or documents concerning the physical and mental condition, diagnosis or treatment of Patrice Brown and/or Tayon Brown from January 1, 2015 through the present, including any drafts, notes, dictations, recordings or other writings.

RESPONSE:

4. All correspondence to or from the Respondent to any party regarding or referring Patrice Brown, Tayon Brown, their diagnoses, care, treatment, or this lawsuit.

RESPONSE:

5. All documents evidencing, relating or referring to any review, evaluation or critique concerning the care and treatment received by Patrice Brown and/or Tayon Brown.

RESPONSE:

6. Any and all documents relating to, referring to or containing the results or recommendations from any meeting of a medical committee, board, group or other entity regarding or referencing in any way the procedures followed for the care and treatment of Patrice Brown and/or Tayon Brown.

RESPONSE:

7. Any and all documents identifying any individuals who witnessed or have knowledge of the incident alleged in Plaintiffs' Complaint.

RESPONSE:

8. Copies of any and all policies, procedures, guidelines, bylaws, rules, protocols, regulations, manuals, handbooks, standing orders, training materials or other internal documents that were in effect at the time of the care and treatment of Patrice Brown and/or Tayon Brown any medical conditions outlined in the Complaint including, but not limited to, high-risk pregnancy, premature birth, birth in a non-sterile setting, transfer of patients requiring a higher level of care, respiratory and ventilator care for premature infants, infection control policies for premature infants, and monitoring, care and treatment of premature and/or ICU/NICU infants.

RESPONSE:

9. All documents mentioned or identified in your answer to Plaintiffs' interrogatories.

RESPONSE:

10. A log identifying any documents known to you and requested by any of the foregoing interrogatories or production requests which you claim to be work product or subject to any common law or statutory privilege, and with respect to each document, specify the title and type of document, date, author(s) name(s), name(s) and position(s) of anyone who received or reviewed the document and a brief description of the information contained and the legal basis for the claim for the claim of privilege.

RESPONSE:

Respectfully submitted,

/s/ Brian Shactman
Brian Shactman
Attorney for Plaintiff

ROSENBERG, EISENBERG & ASSOCIATES, LLC
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